

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

MARGARET E. DARGAN, a single person and)
resident of the State of Oregon,)

Plaintiff,)

v.)

GARY V. INGRAM, a Washington resident)
individually. PAMELA M. NODUS, a)
Washington resident individually, and the)
marital community of GARY V. INGRAM and)
PAMELA M. NODUS,)

Defendants.)

Case No.: C08-1714 RSL

**DECLARATION OF T. JEFFREY
KEANE IN RESPONSE TO ORDER
TO SHOW CAUSE**

T. Jeffrey Keane, being first duly sworn upon oath, under penalty of perjury hereby
deposes and says:

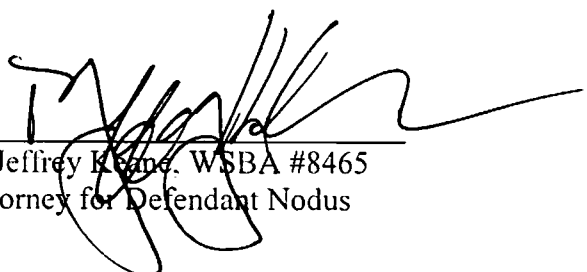
1. I am over the age of majority, am competent to testify herein, and have
personal knowledge of the matters stated:

2. I received the Court's order to show cause and make this response. I am
counsel for a party to a case in federal court. I am obliged to know the rules, all the rules, and
follow them. I was unaware of the rule regarding providing chambers copies of filings greater
than 50 pages. Ms. Nodus's submittal was greater than 50 pages. I should have provided
chambers copies of Ms. Nodus's submittal;

1 3. I am in no position to gauge how egregious an error this is, nor how I should
2 be appropriately sanctioned if the Court deems that I should be sanctioned. I will leave that
3 decision entirely to the Court. From my perspective, it is sufficient sanction to call this to my
4 attention, make me suffer the appropriate professional embarrassment it caused, and have the
5 Court note that since I began practice in the Western District in 1982 my professional conduct
6 has never before been the subject of an order to show cause. This most certainly will not
7 occur again and I will immediately honor any sanction order entered by the Court.
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9 I SWEAR UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE
10 UNITED STATES OF AMERICA AND THE STATE OF WASHINGTON THAT THE
11 ABOVE AND FOREGOING IS TRUE AND CORRECT.

12 DATED at Seattle, Washington this 27 day of March, 2009.

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15 T. Jeffrey Keane, WSBA #8465
16 Attorney for Defendant Nodus
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